

# Exhibit 4

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

BELINDA ORTIZ, LENARD TAYLOR,  
EULALIO MENDEZ JR., LIONEL  
ESTRADA, ESTELA GARCIA ESPINOSA,  
ROXSANNE HERNANDEZ, LYDIA LARA,  
MARGARITO MARTINEZ LARA,  
MAXIMINA MARTINEZ LARA,  
and *LA UNION DEL PUEBLO ENTERO, INC.*,  
Plaintiffs,

V.

STATE OF TEXAS; JOHN STEEN, in his  
Official capacity as Texas Secretary of State;  
and STEVE McCRAW, in his official capacity  
as Director of the Texas Department of  
Public Safety,  
Defendants,

Civil Action No. 2:13-CV-348

Consolidated into Lead Case  
2:13-CV-193

**RULE 26 INITIAL DISCLOSURES OF PLAINTIFFS BELINDA ORTIZ, LENARD TAYLOR, EULALIO MENDEZ JR., LIONEL ESTRADA, ESTELA GARCIA ESPINOSA, ROXSANNE HERNANDEZ, LYDIA LARA, MARGARITO MARTINEZ LARA, MAXIMINA MARTINEZ LARA, and LA UNION DEL PUEBLO ENTERO, INC.**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, BELINDA ORTIZ, LENARD TAYLOR, EULALIO MENDEZ JR., LIONEL ESTRADA, ESTELA GARCIA ESPINOSA, ROXSANNE HERNANDEZ, LYDIA LARA, MARGARITO MARTINEZ LARA, MAXIMINA MARTINEZ LARA, and *LA UNION DEL PUEBLO ENTERO, INC.* (“Ortiz Plaintiffs”), provide the following information to the other parties to this case and other cases consolidated with this one (2:13-CV-193; 2:13-CV-263; 1:13-CV-291) as follows:

**(a)(1)(A):** The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

**Response:**

In addition to themselves, Ortiz Plaintiffs name all other parties to this case and the other cases consolidated with this one as persons likely to have discoverable information.

These parties can be contacted through their respective counsel. In addition, Ortiz Plaintiffs incorporate by reference all other persons named by Plaintiffs or Plaintiff-Intervenors in the other cases consolidated with this one, and further incorporate their contact information and subjects of information.

**(a)(1)(B):** A copy of, or a description by category and location of, all documents, data, compilations, and tangible things that are in the possession, custody, or controls of the party and the disclosing party may use to support its claims or defenses, unless solely for impeachment.

**Response:**

In addition to their own declarations, Ortiz Plaintiffs incorporate by reference all other items disclosed or provided by the parties to this case and the other cases consolidated with this one.

**(a)(1)(C):** A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including material bearing on the nature and extent of damages.

**Response:**

Plaintiffs are entitled to recover their reasonable and necessary court costs, expert fees and attorneys' fees to be described more fully in discovery, expert designations, and future court filings.

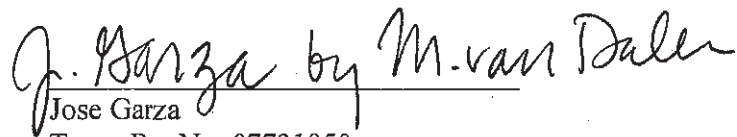
**(a)(1)(D):** Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment, which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**Response:**

None.

Dated: April 10, 2014

Respectfully Submitted,

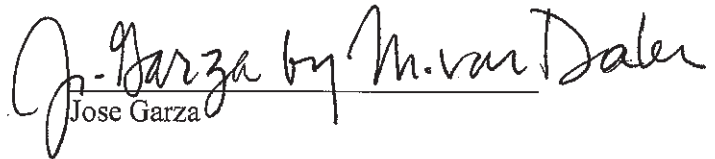
  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent by electronic transmission to all other parties to this case and the cases consolidated with it through their respective counsel on the date this disclosure was made.

 by M. van Dalen  
Jose Garza